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* *Pro hac vice* to be submitted.

17 *Attorneys for Defendant Hibu Inc.*

18
19
20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 BLAKE COOLEY, individually and on behalf
23 of all others similarly situated,

24 Plaintiff,
25
vs.

26 HIBU INC., a Delaware Corporation,

27 Defendant.

28 Case No. 19-cv-00269-MMD-VCF

29
30 **DEFENDANT'S UNOPPOSED MOTION**
31 **FOR LEAVE FOR AN EXTENSION OF**
32 **TIME TO RESPOND TO PLAINTIFF'S**
33 **CLASS ACTION COMPLAINT**

34
35 **(FIRST REQUEST)**

36
37 Defendant Hibu Inc. ("Hibu") respectfully files this motion for leave for an extension of
38 time to respond to Plaintiff Blake Cooley's ("Plaintiff") class action complaint. Dkt. No. 1.

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40 The deadline for Hibu to respond to Plaintiff's class action complaint is March 20, 2019.

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43 DEFENDANT'S UNOPPOSED MOTION FOR LEAVE FOR AN EXTENSION OF TIME TO RESPOND TO
44 PLAINTIFF'S CLASS ACTION COMPLAINT(FIRST REQUEST) - 1

1 Due to the nature of the allegations in this Telephone Consumer Protection Act class action, Hibu
2 requests the Court extend the time to file its response by 21 days to April 10, 2019.

3 Plaintiff's counsel consented to the filing of this motion on March 18, 2019 via email.
4

5 If granted, the new deadline for Hibu to file its response to Plaintiff's class action
6 complaint would be no later than Wednesday, April 10, 2019. This request is made in good faith
7 and for no improper purpose and does not prejudice either party.

8 WHEREFORE, Hibu respectfully requests the Court grant this motion for leave for an
9 extension of time to respond to Plaintiff's class action complaint.
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11 Dated: March 19, 2019

Respectfully submitted,

12 /s/ Charles H. McCrea
13 Charles H. McCrea
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* *Pro hac vice* to be submitted.

20 *Attorneys for Defendant Hibu Inc.*

22 IT IS SO ORDERED:
23 
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: 3-20-2019
26

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on the following parties via the Court's CM/ECF electronic filing system on this 19th day of March 2019:

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/s/ Charles H. McCrea
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DEFENDANT'S UNOPPOSED MOTION FOR LEAVE FOR AN EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S CLASS ACTION COMPLAINT(FIRST REQUEST) - 3